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UNITED STATES DISTRICT COURT
 EASTERN DISTRICT OF CALIFORNIA

<p>ESTATE OF FRANK CARSON AND GEORGIA DEFILIPPO, as an individual and as successor in interest to FRANK CARSON,</p> <p>Plaintiffs,</p> <p>vs.</p> <p>COUNTY OF STANISLAUS, CITY OF MODESTO, BIRGIT FLADAGER, MARLISSA FERREIRA, DAVID HARRIS; KIRK BUNCH, STEVE JACOBSON, JON EVERS, CORY BROWN, and DOES 1-25, inclusive,</p> <p>Defendants.</p>	<p>Case No. 1:20-CV-00747-TLN-BAM</p> <p>JOINT STIPULATION AND [PROPOSED] ORDER TO EXTEND PAGE LIMIT FOR PLAINTIFFS' OPPOSITIONS TO DEFENDANTS' MOTION TO DISMISS</p> <p>Related to: 1:15-cv-00311-TLN-BAM (Athwal) 1:20-cv-00770-TLN-BAM (Wells)</p>
<p>GEORGIA DEFILIPPO AND CHRISTINA DEFILIPPO,</p> <p>Plaintiffs,</p> <p>vs.</p> <p>COUNTY OF STANISLAUS, ET AL.</p> <p>Defendants.</p>	<p>Case No. 1:18-cv-00496-TLN-BAM</p>

1	EDUARDO QUINTANAR, JR.,	Case No. 1:18-cv-01403-TLN-BAM
2	Plaintiffs,	
3	vs.	
4	COUNTY OF STANISLAUS, ET AL.	
5	Defendants.	
6		

7

8 On November 13, 2020, the Honorable Judge Nunley consolidated this matter with

9 related cases *DeFilippo, et al v. Stanislaus et al*, USDC No. 1:18-cv-00496; *Quintanar v.*

10 *Stanislaus, et al*, USDC No. 1:18-cv-01403; *Wells, et al v. Stanislaus et al*, USDC No. 1:20-cv-

11 00770; and *Athwal, et al v. Stanislaus et al* USDC No. 1:15-cv-0031, for discovery purposes

12 (Docket #23 of *Carson, et al.*). The parties in this matter filed a stipulation and proposed order

13 extending the pages limit to twenty-five (25) for Plaintiffs' Oppositions to Defendants' FRCP

14 12(b)(6) motions to dismiss, in related case *Athwal, et al. v. Stanislaus, et al.*, USDC No. 1:15-

15 cv-0031 (Docket # 185). That stipulation, attached here as **Exhibit A**, is a true and accurate

16 copy of the parties' Joint Stipulation and Proposed Order to Extend Page Limit for Plaintiffs'

17 Oppositions to Defendants' FRCP 12(b)(6) Motions to Dismiss, in all related cases.

18

19 DATE: March 28, 2022

GWILLIAM, IVARY, CHIOSSO, CAVALLI & BREWER

20

21 /s/ Angelina M. Austin

22 J. Gary Gwilliam
 23 Randall E. Strauss
 Jayme L. Walker
 Angelina M. Austin
 Attorneys for Plaintiffs
 ESTATE OF FRANK CARSON , GEORGIA
 25 DEFILIPPO, CHRISTINA DEFILIPPO AND
 26 EDUARDO QUINTANAR, JR.

EXHIBIT A

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and SCOTT McFARLANE

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

BALJIT ATHWAL and DALJIT ATWAL,

Plaintiffs,

v.

COUNTY OF STANILSAUS; CITY OF
TURLOCK; CITY OF MODESTO; CITY OF
CERES; STANISLAUS COUNTY OFFICE OF
THE DISTRICT ATTORNEY; KIRK BUNCH;
JON EVERS; TIMOTHY REDD; DALE
LINGERFELT; STEVE JACOBSON; BIRGIT
FLADAGER; GALEN CARROLL;

Defendants.

WALTER W. WELLS and SCOTT
MCFARLANE

Plaintiffs,

v.

COUNTY OF STANISLAUS, ET AL.

Defendants.

Case No. 1:15-cv-00311-TLN-BAM

**JOINT STIPULATION AND
[PROPOSED] ORDER TO EXTEND
PAGE LIMIT FOR PLAINTIFFS'
OPPOSITIONS TO DEFENDANTS'
MOTIONS TO DISMISS**

Hon. Troy L. Nunley

Trial: None Set

Related to:
CASE NO. 1:20-CV-00770-TLN-BAM
CASE NO. 1:20-CV-00747-TLN-BAM
CASE NO. 1:18-cv-00496-TLN-BAM
CASE NO. 1:18-cv-01403-TLN-BAM

Case No. 1:20-cv-00770-TLN-BAM

FRANK CARSON,

Plaintiffs,

v.

COUNTY OF STANISLAUS, CITY OF
MODESTO, CITY OF CERES, BIRGIT
FLADAGER, MARLISSA FERREIRA, DAVID
HARRIS, KIRK BUNCH, STEVE JACOBSON,
JON EVERS, CORY BROWN, and DEREK
PERRY, and DOES 1-25, inclusive,

Defendants.

Case No. 1:20-cv-00747-TLN-BAM

GEORGIA DEFILIPPO AND CHRISTINA
DEFILIPPO

Plaintiffs,

v.

COUNTY OF STANISLAUS, ET AL.

Defendants.

Case No. 1:18-cv-00496-TLN-BAM

EDUARDO QUINTANAR, JR.,

Plaintiffs,

v.

COUNTY OF STANISLAUS, ET AL.

Defendants.

Case No. 1:18-cv-01403-TLN-BAM

1 Defendants COUNTY OF STANISLAUS; CITY OF MODESTO; STANISLAUS
2 COUNTY OFFICE OF THE DISTRICT ATTORNEY; BIRGIT FLADAGER; MARLISSA
3 FERREIRA; DAVID HARRIS; KIRK BUNCH; STEVE JACOBSON; CORY BROWN; JON
4 EVERS; TIMOTHY REDD; DALE LINGERFELT; GALEN CARROL; FROLIAN
5 MARISCAL; LLOYD MCKINNON; GREG JONES; KENNETH BARRINGER; GALEN
6 CARROLL; and FRANK NAVARRO (“Defendants”) and Plaintiffs ESTATE OF FRANK
7 CARSON; GEORGIA DEFILIPPO; CHRISTINA DEFILIPPO; EDUARDO QUINTANAR, JR.;
8 BALJIT ATHWAL; DALJIT ATHWAL; WALTER WELLS; and SCOTT MCFARLANE
9 (“Plaintiffs”) through their respective counsel, hereby agree and stipulate as follows:

10 1. WHEREAS Plaintiffs have been served with multiple separate motions to
11 dismiss;

12 2. WHEREAS Plaintiffs have settled their claims against City of Ceres and City of
13 Turlock;

14 3. WHEREAS additional space is needed to respond to the arguments raised by the
15 remaining Defendants;

16 4. All parties agree to a 25 page limit for Plaintiffs’ Oppositions to Defendants’
17 FRCP 12(b)(6) motions to dismiss.

1 Dated: March 28, 2022

Respectfully submitted,

2 ARTURO J. GONZÁLEZ
3 JESSICA L. GRANT
4 MATTHEW CHIVVIS
5 ROBERT S. SANDOVAL
6 MEREDITH L. ANGUEIRA
7 MORRISON & FOERSTER LLP

8 By: /s/ Arturo J. González
9 ARTURO J. GONZÁLEZ

10 Attorneys for Plaintiffs
11 BALJIT ATHWAL, DALJIT ATWAL,
12 WALTER WELLS, and SCOTT
13 MCFARLANE

14 Dated: March 28, 2022

15 ALLEN, GLAESSNER, HAZELWOOD &
16 WERTH, LLP

17 By: /s/ Dale L. Allen, Jr.
18 DALE L. ALLEN, JR.
19 PATRICK D. MORIARTY
20 JOHN B. ROBINSON

21 Attorneys for Defendants
22 CITY OF MODESTO, JON EVERS, and
23 GALLEN CARROLL

24 Dated: March 28, 2022

25 GWILLIAM, IVARY, CHIOSSO, CAVALLI
26 & BREWER

27 By: /s/ Angelina M. Austin
28 J. Gary Gwilliam
Randall E. Strauss
Jayme L. Walker
Angelina M. Austin

Attorneys for Plaintiffs
ESTATE OF FRANK CARSON, GEORGIA
DEFILIPPO, CHRISTINA DEFILIPPO AND
EDUARDO QUINTANAR, JR.

Dated: March 28, 2022

PORTER SCOTT
A PROFESSIONAL CORPORATION

By: **/s/ John R. Whitefleet*
John R. Whitefleet

Attorneys for Defendants
COUNTY OF STANISLAUS, STANISLAUS
COUNTY OFFICE OF THE DISTRICT
ATTORNEY, BIRGIT FLADAGER,
MARLISSA FERRIERA, DAVID HARRIS,
KIRK BUNCH, STEVE JACOBSON, CORY
BROWN, DALE LINGERFELT, FROLIAN
MARISCAL, LLOYD MACKINNON, GREG
JONES, KENNETH BARRINGER

** Parties have consented to use of their electronic signature.*

[PROPOSED] ORDER

Pursuant to the stipulation of the parties:

The page limit for Plaintiffs' Oppositions to Defendants' FRCP 12(b)(6) Motions to Dismiss is extended to twenty-five (25)

IT IS SO ORDERED.

Dated: _____, 2022

District Judge Troy L. Nunley